

Routing:

Section Chief: _____

State Coordin: _____

Facility File: _____

EPA RCRA Permit Oversight Checklist

Facility name: ETICAM

EPA ID No.: NVD 980895338

Document Type (1st NOD, Warning Letter, Draft Permit, etc.): _____
Draft Permit

State Office Received from: NDEP

State Permit Writer(s): Tom Fronapfel

EPA Reviewer: Claire Elliott

Type of Facility:			Reviewed by EPA		Date
Impoundments:	yes	no	yes	no	_____
Landfill:	yes	no	yes	no	_____
Wastepile:	yes	no	yes	no	_____
Tank:	yes <input checked="" type="checkbox"/>	no	yes <input checked="" type="checkbox"/>	no	_____
Container:	yes <input checked="" type="checkbox"/>	no	yes <input checked="" type="checkbox"/>	no	_____

Additional comments: _____

Tank and Containers

rating of this section of the document:

1	2	3	4	5
unsatisfactory		satisfactory		excellent

In evaluating this section of the document, consider the following questions:

- Did the facility consider all of the units at the facility?
- Did the review consider all of the applicable technical requirements: containment facility design, tank wall thickness calculations, and liner-waste compatability?
- Did the review consider all of the applicable operational requirements: run-on/run-off controls, aisle space, liquid level controls for tanks, inspections, segregation of incompatible wastes?
- Were sound engineering judgments made?
- Did the review adhere to all current applicable guidance?

response: No condition for regulation of sludges
(which are H.W. irregardless of the concentration
of constituents since they come from listed H.W.).

Container conditions included even though Part A
does not list containers

Because the WWT facility is subject to the regulation
under 307(b) of the CWA it is exempt from
regulation by RCRA. Therefore only Storage
in Tanks needed to be addressed. (264.1)

General Facility Standards

rating of this section of the document:

1	2	3	4	5
unsatisfactory		satisfactory		excellent

In evaluating this section of the document, consider the following questions:

- Did the review consider whether the facility is a commercial or an on-site facility?
- Did the review take into account the size and complexity of the facility?
- Were all of the waste streams handled on site covered by this review? yes
- Were the facility location standards considered throughout this review? yes (not in flood plain, no faults w/in 18,000 ft)
- Were the general facility standards (waste analysis, personnel training, contingency plan, and inspections) discussed in sufficient detail to ensure that wastes can be handled safely at the facility? seems so

response: max. cap. of waste at site not specified
Closure Cost estimate not referenced in permit
condition

Overall Evaluation Of the Document:

1	2	3	4	5
unsatisfactory		satisfactory		excellent

Explain how you arrived at the overall rating of this document.
In doing so, consider the following questions:

- Did this document adequately address the major deficiencies in the application? If not, which part of the review are weak, and how could they be improved? Which parts of the review are strongest?
- Were the comments presented in an understandable manner?
- Through review of this document, does it appear that the the state permit writer has a working understanding of the RCRA regulations?
- Is this document a product of an activity outlined in the facility FMP? If so, did the submittal meet the timeline specified in the FMP? If not, is it clear how this document would fit into the FMP?
- Does this document reflect the concerns of all of the involved agencies? no HSWA
- Does this review raise any issues that need to be resolved by EPA? Joint permit

did not address HSWA

response: Boiler Plate permit used with little \$ in
the way of site -specific conditions included
Treatment process exempt - not clear Tom
not clear that treatment in "Wastewater
Treatment Units" is exempt from reg by
RCRA. Need for joint permit - need to address
HSWA not realized. No FMP - new fac.